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USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 04/08/2024

April 5, 2024

**VIA ECF WITH COURTESY COPY VIA EMAIL**

Hon. Analisa Torres  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, New York 10007  
Torres\_NYSDChambers@nysd.uscourts.gov

Re: *Certain Underwriters, et al. v. NIBCO INC.*,  
Case No. 1:24-cv-00864-AT (S.D.N.Y.)

**Motion for Extension of Time To File Jurisdictional Letter**

Dear Judge Torres:

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Local Rules 5.2(b) and 7.1(d), and Sections I(B) and I(C) of Your Honor's Individual Practices, Defendant NIBCO INC. ("NIBCO") requests a 14-day extension of time to file the jurisdictional letter required by Section II(B) of Your Honor's Individual Practices, up to and including **Monday, April 22, 2024**. Counsel for Plaintiffs consents to this request.

NIBCO is required to file a letter explaining this Court's jurisdiction over this lawsuit, which is predicated on diversity jurisdiction. See Section II(B) of Your Honor's Individual Practices. That letter is currently due by **April 8, 2024** (i.e., the deadline for submitting a proposed Case Management Plan and Scheduling Order). *Id.*; see also ECF 8, at ¶ 1.

On April 4, 2024, Plaintiffs filed their Amended Complaint, adding eleven new plaintiffs to this case. See ECF 15, at ¶¶ 1-5, 7-12. Due to the joinder of these parties, NIBCO needs additional time to thoroughly investigate and assess the impact of the Amended Complaint on diversity jurisdiction. This includes the need to serve and receive responses to any Local Rule 26.1 demands for verified statements regarding Plaintiffs' jurisdictions of incorporation, principal places of business, and any other necessary jurisdictional information not alleged in the Amended Complaint.

Therefore, NIBCO requests an extension of time to file the required jurisdictional letter, up to and including **Monday, April 22, 2024**. Based on the foregoing reasons, there is good cause to grant this extension.

NIBCO's deadline to file the required jurisdictional letter has not been extended previously, and the requested extension does not interfere with any other existing deadline.

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April 5, 2024

We appreciate the Court's attention to this matter.

Very truly yours,



Thuy T. Bui

TTB/elm

cc: Michael J. Lorusso, Esq., counsel for Plaintiffs (via ECF)

GRANTED.

SO ORDERED.

Dated: April 8, 2024  
New York, New York



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ANALISA TORRES  
United States District Judge